

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

CIVIL ACTION NO. 4:16-CV-2482-JFA-TER

Marilyn Miller,

Plaintiff,

vs.

Pickens County Sheriff's Department,
Sheriff Rick Clark, Captain Keith Galloway,
Southern Health Partners, and Various
Jane and John Does,

Defendants.

**RULE 26(A)(3) PRETRIAL
DISCLOSURES FROM PICKENS
COUNTY SHERIFF'S DEPARTMENT,
SHERIFF RICK CLARK, CAPTAIN
KEITH GALLOWAY AND ANY DOES
ALLEGED TO WORK FOR PICKENS
COUNTY**

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure Defendants Pickens County Sheriff's Department, Sheriff Rick Clark, Captain Keith Galloway and any Does alleged to work for Pickens County hereby make the following disclosures, by and through undersigned counsel:

I. IDENTIFICATION OF WITNESSES

- 1. Dr. Gary Sellman
Southern Health Partners**

2. **Debbie Mangiameli
Vickie Fowler
Kelly Bray
Nursing staff Southern Health Partners**

The names of the individual nurses are currently unavailable.

3. **Tammy Hamilton
Pickens County Detention Center**
4. **Plaintiff Marilyn Miller**
5. **Joanne Tice
Southern Health Partners**
6. **Jennifer Hairsine
Southern Health Partners**
7. **Oliver Harden, MD**
8. **Sheriff Rick Clark
Pickens County Sheriff's Department**
9. **Kristie Leopard
Pickens County Sheriff's Department**
10. **Custodians of Records** as needed.

11. **Reservation:** Defendants reserve the right to call witnesses for purposes of impeachment, authentication, and/or rebuttal.

III. DEPOSITION DESIGNATIONS

None at this time. . The Defendant reserves the right to use deposition testimony of any unavailable witness. The following witnesses have been deposed pursuant to FRCP 30(b) (6):

Joanne Tice

Jennifer Hairsine

The Defendants may also publish portions of the Plaintiff's deposition if she fails to appear or for impeachment.

IV. IDENTIFICATION OF EXHIBITS

1. These Defendants reserve the rights to use the same exhibits identified by Defendant Southern Health Partners in their disclosures. (Entry 59)

2. These Defendants reserve the right to supplement these responses and use any documents exchanged during discovery.
3. All documents and exhibits offered by any other party to this matter.
4. All documents required to rebut or impeach.
5. Defendant is not conceding the admissibility of any of the aforementioned documents without proper foundation.

Respectfully submitted,

CLAWSON and STAUBES, LLC

/s/ Amy M. Snyder

Amy M. Snyder

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